

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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ROGER BOWERS, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

TESARO INCORPORATED, LEON O.  
MOULDER JR. and TIMOTHY R. PEARSON,

Defendants.

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No. 1:18-cv-10086-ADB

**MOTION BY THE EMPLOYEES RETIREMENT SYSTEM OF PUERTO RICO  
ELECTRIC POWER AUTHORITY FOR APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF SELECTION OF LEAD AND LIASON COUNSEL**

Movant the Employees Retirement System of Puerto Rico Electric Power Authority (hereinafter collectively referred to as “ERS-PREPA”), by its counsel, hereby moves this Court for an Order (attached hereto as Exhibit A): (i) appointing ERS-PREPA as Lead Plaintiff; (ii) approving ERS-PREPA’s selection of the law firm of Abraham, Fruchter & Twersky, LLP to serve as Lead Counsel; (iii) approving ERS-PREPA’s selection of the law firm of Shapiro Haber & Urmy LLP as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper.

In support of this Motion, ERS-PREPA submits herewith a Memorandum of Law and the Declaration of Adam M. Stewart.

## **REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), the ERS-PREPA respectfully submit that it believes oral argument may assist the Court and wishes to be heard on this matter.

Dated: March 19, 2018

Respectfully submitted,

**/s/Adam M. Stewart**

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 19, 2018.

**/s/ Adam M. Stewart**  
Adam M. Stewart